



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

June 23, 2020

Mr. Ronald T. Repasi
Acting Chief
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Mr. Donald Stockdale Jr.
Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Promoting Investment in the 3550-3700 MHz Band (GN Docket No. 17-258)

Dear Messrs. Repasi and Stockdale:

The National Telecommunications and Information Administration (NTIA) and the Department of Defense (DoD) have worked closely with the Federal Communications Commission (FCC) as it implements the rules governing Citizens Broadband Radio Service (CBRS) in the 3550-3700 MHz (3.5 GHz) band in the above-referenced proceeding.¹ The collaborative approach taken by government and industry to share the 3.5 GHz band has enabled commercial access to this primary mid-band spectrum for 5G deployments. This letter is to notify you of changes to the protection criteria for eleven designated naval port locations.²

There are eleven designated port facilities that require protection for radar systems that operate in or near the ports at or below the 3550 MHz band edge. Originally, these ports were protected by “always on” dynamic protection areas (DPAs) with potentially affected neighborhoods extending 25 kilometers inland from the port facilities.³ Shortly after commercial deployments began, the Spectrum Access System (SAS) administrators informed NTIA that these DPA-based protections had the unintended effect of precluding outdoor CBRS operations in large portions of several major coastal cities near the protected port locations. The DoD, NTIA, and FCC staff worked with the SAS administrators to re-examine and refine the protection criteria at

¹ See Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258, Notice of Proposed Rulemaking and Order Terminating Petitions, FCC 17-134 (Oct. 24, 2017).

² The dynamic protection area (DPA)-protected naval port facilities include: Alameda, CA; Bremerton, WA; Everett, WA; Long Beach, CA; Mayport, FL; Jacksonville, FL; Norfolk, VA; Pascagoula, MS; Pensacola, FL; San Diego, CA; and Webster Field, MD.

³ The Key Hole Markup File (KML) for the original port facility exclusion zones are available at https://www.ntia.doc.gov/files/ntia/publications/gb_part90_ez.kml.

these port locations to improve commercial access to the band while continuing to protect critical federal operations.

To that end, the DoD completed a detailed assessment of its systems and operational needs in and around the affected port facilities. Based on that assessment, DoD and NTIA agreed to provisionally suspend DPA-based out-of-band emission (OOBE) protection requirements for the affected port locations.⁴ This provisional suspension should allow SASs to authorize commercial deployments in the band in areas near the affected port locations without adverse effects on federal operations. To implement the revised inland DPA protection criteria, SASs should follow the procedures for co-channel protection specified in WINNF-TS-0112 requirement R2-SGN-24(a).⁵

The provisional suspension will be extended to March 30, 2022. After that point in time, a review will be performed by DoD each year with an option to continue the provisional suspension for up to five years, when a final decision will be made on a protection mechanism. If significant or persistent interference is reported, DoD reserves the right to revert to previously established protection criteria or newly developed protection criteria based on CBRS device OOBEs. To successfully implement the OOBE protections, cooperation from the SAS administrators is necessary. Federal users will continue ongoing coordination and collaboration with industry to consider potential mitigation factors and solutions, such as improving the clutter model, in order to reduce the potential for interference. The change in the OOBE protection requirements is captured in the Exclusion Zone KML file (EXZ.kml) on NTIA's website.⁶

NTIA will continue working in collaboration with the Commission, DoD, and industry to protect the federal 3.5 GHz band radar systems while minimizing the constraints on CBRS operations. Should you have any questions, please contact me or Edward Drocella, Chief, Spectrum Engineering and Analysis Division, Office of Spectrum Management, at edrocella@ntia.gov or (202) 482-2608.

Sincerely,

Charles Cooper
Associate Administrator
Office of Spectrum Management

⁴ On March 16, 2020, the KML file for the affected port facilities was changed to reflect the revised OOBE protection criteria.

⁵ Wireless Innovation Forum, *Requirements for Commercial Operation in the U.S. 3550-3700 MHz Citizens Broadband Radio Service Band*, Document WINNF-TS-0112 Version V1.9.1 (Mar. 11, 2020), available at <https://winnf.memberclicks.net/assets/CBRS/WINNF-TS-0112.pdf> at 24.

⁶ The 3.5 GHz band KML files used by the SAS operators are available on NTIA's website: <https://www.ntia.doc.gov/fcc-filing/2015/ntia-letter-fcc-commercial-operations-3550-3650-mhz-band>.